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October 27, 2023

The Honorable Ronnie Abrams  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, NY 10007

**Re: *U.S. v. Lael Young***  
**Docket No. 20 Cr. 391 (RA)**  
**1<sup>st</sup> Request for Adjournment of Oral Argument**

Dear Judge Abrams:

We are scheduled for oral argument on November 1, 2023 regarding pending motion Withdraw Guilty Plea and Dismissed the Indictment filed by Lael Young. With the consent of the Government, I am requesting that the that oral argument be adjourned because I am preparing for trial scheduled to commence in the SDNY before the Honorable Vernon Broderick, U.S.D.J. on November 20, 2023.<sup>1</sup> Based upon the volume of materials and the anticipated legal issues that will be raised, I cannot adequately prepare for oral argument while preparing for an international narcotics importation trial. The trial is expected to last 2-3 weeks.

I am requesting that oral argument be rescheduled for one of the following dates in December; 18<sup>th</sup>, 20<sup>th</sup>, or the 21<sup>st</sup>. If the proposed dates are not convenient for the court, I would ask the court to consider January 16, 2024 or January 18, 2024. This is Mr. Young's first request for an adjournment of oral argument.

Thank you for your thoughtful consideration.

Sincerely,

FOY & SEPLOWITZ LLC

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cc: AUSA Mary Christy Slavik

Application granted. The oral argument is  
adjourned to December 20, 2023 at 2:30 p.m.

SO ORDERED.

Ronnie Abrams, U.S.D.J.  
October 27, 2023

<sup>1</sup> *US. v. Carlos Orense Azocar*, 21 cr 379. Yesterday I received a portion of voluminous 3500 material. There are pre-trial filing deadlines on November 1, 2023 and November 8, 2023. Final pre-trial conference November 14, 2023. Jury selection November 20, 2023. Opening statements and testimony to commence on November 27, 2023.